

# GHAJAR EXHIBIT 5

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,  
  
*Individual and Representative Plaintiffs,*  
  
v.  
  
Meta Platforms, Inc.,  
  
*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF TA-NEHISI COATES'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
 3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase,  
 14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
 15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the  
 24 phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds,  
 25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

terms “You” and “Your” as referring to Plaintiff Ta-Nehisi Coates. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF JUNOT DIAZ'S RESPONSES  
TO DEFENDANT META PLATFORMS,  
INC.'S SECOND SET OF REQUESTS FOR  
ADMISSION**

YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

**REQUEST FOR ADMISSION NO. 21:**

Admit that, other than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the infringement alleged in the COMPLAINT.

**RESPONSE TO REQUEST NO. 21:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase, “other than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

**REQUEST FOR ADMISSION NO. 22:**

Admit that YOU are personally unaware of any instance in which a PERSON read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 22:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Junot Diaz. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in him individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.



1 Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

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20 *and the Proposed Class*  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

RICHARD KADREY, *et al.*,

Individual and Representative  
Plaintiffs,

Case No. 3:23-cv-03417-VC

PLAINTIFF CHRISTOPHER  
FARNSWORTH'S RESPONSES TO  
DEFENDANT'S FIRST SET OF REQUESTS  
FOR ADMISSIONS

PLAINTIFF CHRISTOPHER FARNSWORTH'S  
RESPONSES TO RFA'S, SET 1  
No. 3:23-CV-03417-VC

v.

META PLATFORMS, INC, a Delaware  
corporation,

Defendant.

PROPOUNDING PARTY: DEFENDANT META PLATFORMS, INC.

RESPONDING PARTY: PLAINTIFF CHRISTOPHER FARNSWORTH

SET NO.: ONE

### **INTRODUCTION**

Plaintiff Christopher Farnsworth (“Plaintiff”) hereby serves his responses and objections to Defendant Meta Platforms, Inc.’s (“Defendant” or “Meta”) First Set of Requests for Admissions (the “Requests” or “RFAs”).

### **GENERAL OBJECTIONS**

1. Plaintiff generally objects to Defendant’s definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work product doctrine, expert disclosure rules, or other applicable privileges and protections, including communications with Plaintiff’s attorneys regarding the Action.

3. Discovery in this matter is ongoing and Plaintiff reserves the right to amend, modify, or supplement these responses with subsequently discovered responsive information and to introduce and rely upon any such subsequently discovered information in this litigation.

1 duplicative in whole or in part of Request No. 12. Plaintiff also objects that Plaintiff's position  
2 regarding other Request for Admission responses is not the proper subject of a Request for  
3 Admission.

4 Subject to and without waiving these general and specific objections, Plaintiff does not  
5 respond to this Request because by its own terms the Request is conditioned upon denying  
6 Request No. 22 as described. Plaintiff did not deny Request No. 22 as described and directs  
7 Defendant to his response to Response No. 22.

8 **REQUEST FOR ADMISSION NO. 24:**

9 Admit that YOU are personally unaware of any instance in which a PERSON read text  
10 generated by any of Meta's Llama models as a substitute for reading YOUR ASSERTED  
11 WORKS.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

13 Plaintiff objects that the term "substitute" is vague and ambiguous. Plaintiff further  
14 objects to this Request as an improper subject of a Request for Admission.

15 Subject to and without waiving these general and specific objections, Plaintiff responds  
16 that he will not admit or deny this Request, on the grounds that the information requested is not a  
17 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
18 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
19 discovering Plaintiffs' current knowledge or awareness.

20 **REQUEST FOR ADMISSION NO. 25:**

21 Admit that YOU are personally unaware of any documentary evidence demonstrating that  
22 any PERSON has read text generated by any of Meta's Llama models as a substitute for reading  
23 YOUR ASSERTED WORKS.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

25 Plaintiff objects that the terms "documentary evidence" and "substitute" are vague and  
26 ambiguous. Plaintiff further objects to this Request as an improper subject of a Request for  
27 Admission.

28 Subject to and without waiving these general and specific objections, Plaintiff responds

1 that he will not admit or deny this Request, on the grounds that the information requested is not a  
2 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
3 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
4 discovering Plaintiffs' current knowledge or awareness.

5 **REQUEST FOR ADMISSION NO. 26:**

6 Admit that YOU are personally unaware of any text generated by any of Meta's Llama  
7 models that infringes YOUR ASSERTED WORKS.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

9 Plaintiff objects that the term "personally unaware" is vague and ambiguous. Plaintiff  
10 objects to the extent that responding to this Request requires adopting a legal conclusion. Plaintiff  
11 further objects to this Request as an improper subject of a Request for Admission.

12 Subject to and without waiving these general and specific objections, Plaintiff responds  
13 that he will not admit or deny this Request, on the grounds that the information requested is not a  
14 proper subject of a Request for Admission. If a response is deemed required, Plaintiff denies the  
15 Request on this same basis. Plaintiff agrees to meet and confer on the appropriate vehicle for  
16 discovering Plaintiffs' current knowledge or awareness.

17 **REQUEST FOR ADMISSION NO. 27:**

18 Admit that YOU have personally used one of Meta's Llama models.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

20 Plaintiff objects that this Request is not relevant to any claims or defenses.

21 Subject to and without waiving these general and specific objections, Plaintiff denies  
22 Request No. 27.

23 **REQUEST FOR ADMISSION NO. 28:**

24 Admit that YOU have personally used one of the ChatGPT large language models.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

26 Plaintiff objects that this Request is not relevant to any claims or defenses.

27 Subject to and without waiving these general and specific objections, Plaintiff admits  
28 Request No. 28.

**REQUEST FOR ADMISSION NO. 81:**

Admit that you are not aware of any agreements to assign rights in or to YOUR ASSERTED WORK(S) that have not already been produced in this ACTION.

**RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

Plaintiff objects that the terms “any agreements” and “assign rights in or to” are vague and ambiguous. Plaintiff further objects to this Request as compound and ambiguous, because it includes the disjunctive phrase, “in or to.” “[R]equests for admissions should not contain ‘compound, conjunctive, or disjunctive ... statements.’” *James v. Maguire Corr. Facility*, No. C 10-1795 SI PR, 2012 WL 3939343, at \*4 (N.D. Cal. Sept. 10, 2012) (*quoting U.S. ex rel. England v. Los Angeles County*, 235 F.R.D. 675, 684 (E.D. Cal. 2006)); *see also King v. Biter*, No. 115CV00414LJOSABPC, 2018 WL 339052, at \*6 (E.D. Cal. Jan. 9, 2018).

Subject to and without waiving these general and specific objections, Plaintiff admits discovery is ongoing. Plaintiff further admits that Plaintiff has produced non-privileged documents in Plaintiff’s possession, custody, or control, responsive to Meta’s requests for production regarding licensing agreements for Plaintiff’s Asserted Works. Plaintiff otherwise denies this Request.

Dated: November 18, 2024

Respectfully submitted,

LIEFF CABRASER HEIMANN & BERNSTEIN, LLP

By: /s/ Rachel Geman

Rachel Geman

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF CHRISTOPHER GOLDEN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds,  
25 admit.



**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

terms “You” and “Your” as referring to Plaintiff Christopher Golden. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF ANDREW SEAN GREER'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds,  
25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

terms “You” and “Your” as referring to Plaintiff Andrew Sean Greer. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF DAVID HENRY HWANG'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**



1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds,  
25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**



1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in him individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

terms “You” and “Your” as referring to Plaintiff David Henry Hwang. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Bryan L. Clobes

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF RICHARD KADREY'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds,  
25 admit.

**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in his individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

terms “You” and “Your” as referring to Plaintiff Richard Kadrey. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by him is insufficient to enable him to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,  
*Individual and Representative Plaintiffs,*  
v.  
Meta Platforms, Inc.,  
*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF MATTHEW KLAM'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**



1 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
 2 use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether Plaintiff  
 3 believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
 6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
 7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
 8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 13 terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff objects to the phrase, “other  
 14 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
 15 use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
 18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
 21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
 22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
 23 terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff further objects to the phrase  
 24 “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
 27 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
 28 ASSERTED WORKS.



**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Matthew Klam. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in him individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in him individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

By: /s/ Bryan L. Clobes  
Bryan L. Clobes

3 Bryan L. Clobes (pro hac vice)  
4 Alexander J. Sweatman (pro hac vice)  
5 Mohammed Rathur (pro hac vice)  
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19 *Counsel for Individual and Representative Plaintiffs*  
20 *and the Proposed Class*  
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Cadio Zirpoli (State Bar No. 179108)  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF LAURA LIPPMAN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
2 use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether Plaintiff  
3 believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase, “other  
14 than YOUR contention that LLM developers such as Meta should have compensated YOU to allegedly  
15 use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff further objects to the phrase  
24 “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

25 **REQUEST FOR ADMISSION NO. 23:**

26 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
27 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
28 ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Laura Lippman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not relevant to any claims or defenses in this dispute since this case concerns Meta’s large language models. Plaintiff, in her individual capacity, responds, deny.

**REQUEST FOR ADMISSION NO. 26:**

Admit that YOU have personally used one of the ChatGPT large language models.

1 Dated: July 22, 2024

By: /s/ Bryan Clobes  
Bryan L. Clobes

3 Bryan L. Clobes (pro hac vice)  
4 Alexander J. Sweatman (pro hac vice)  
5 Mohammed A. Rathur (pro hac vice)  
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20 *and the Proposed Class*  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-06663

**PLAINTIFF SARAH SILVERMAN'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds,  
25 admit.



**REQUEST FOR ADMISSION NO. 23:**

Admit that YOU are personally unaware of any documentary evidence demonstrating that any PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 23:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff also objects to the term “documentary evidence” as being vague and overbroad because it is not limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 24:**

Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models that infringes YOUR ASSERTED WORKS.

**RESPONSE TO REQUEST NO. 24:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff objects to the phrase “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

**REQUEST FOR ADMISSION NO. 25:**

Admit that YOU have personally used one of Meta’s Llama models.

**RESPONSE TO REQUEST NO. 25:**

Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not

terms “You” and “Your” as referring to Plaintiff Sarah Silverman. Plaintiff further objects to the phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections, Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained by her is insufficient to enable her to admit or deny.

Dated: July 22, 2024

By: /s/ Joseph R. Saveri  
Joseph R. Saveri

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Cadio Zirpoli (State Bar No. 179108)  
Christopher K.L. Young (State Bar No. 318371)  
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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF RACHEL LOUISE SNYDER'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds,  
25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff also objects to the  
9 term “documentary evidence” as being vague and overbroad because it is not limited to the specific  
10 claims and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally  
11 unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

1 terms “You” and “Your” as referring to Plaintiff Rachel Louise Snyder. Plaintiff further objects to the  
 2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

By: /s/ Bryan Clobes  
 Bryan L. Clobes

7  
 8 Bryan L. Clobes (pro hac vice)  
 Alexander J. Sweatman (pro hac vice)  
 Mohammed Rathur (pro hac vice)  
 9 **CAFFERTY CLOBES MERIWETHER**  
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 18 *and the Proposed Class*

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UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

RICHARD KADREY, SARAH SILVERMAN,  
CHRISTOPHER GOLDEN, TA-NEHISI  
COATES, JUNOT DÍAZ, ANDREW SEAN  
GREER, DAVID HENRY HWANG,  
MATTHEW KLAM, LAURA LIPPMAN,  
RACHEL LOUISE SNYDER, JACQUELINE  
WOODSON, AND LYSA TERKEURST,

*Individual and Representative Plaintiffs,*

v.

META PLATFORMS, INC.;

*Defendant.*

Case No. 3:23-cv-03417-VC

**PLAINTIFF LYSA TERKEURST'S  
RESPONSES AND OBJECTIONS TO  
DEFENDANT META PLATFORMS,  
INC.'S SECOND SET OF REQUESTS  
FOR ADMISSION**

Plaintiff Lysa TerKeurst ("Plaintiff") hereby responds to Defendant Meta Platforms, Inc.'s ("Defendant" or "Meta") Second Set of Requests for Admissions (the "Requests" or "RFAs").

**GENERAL OBJECTIONS**

1. Plaintiff generally objects to Defendant's definitions and instructions to the extent they purport to require Plaintiff to respond in any way beyond what is required by the Federal and local rules.

2. Plaintiff objects to the Requests to the extent they seek information or materials that are protected from disclosure by attorney-client privilege, the work-product doctrine, expert

1 have compensated YOU to allegedly use” as irrelevant and unintelligible. Subject to and without  
2 waiving these objections, Plaintiff denies Request No. 21.

3 **REQUEST FOR ADMISSION NO. 22:**

4 Admit that YOU are personally unaware of any instance in which a PERSON read text  
5 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED  
6 WORKS.

7 **RESPONSE TO REQUEST NO. 22:**

8 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
9 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
10 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
11 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff  
12 further objects to the phrase “you are personally unaware” as unintelligible. Subject to and  
13 without waiving these objections, Plaintiff admits that she is currently personally unaware of any  
14 instance in which a PERSON read text generated by any of Meta’s Llama models as a substitute  
15 for reading any of Plaintiff’s ASSERTED WORKS but denies that Plaintiff’s lack of awareness  
16 has any bearing on whether such conduct has occurred.

17 **REQUEST FOR ADMISSION NO. 23:**

18 Admit that YOU are personally unaware of any documentary evidence demonstrating  
19 that any PERSON has read text generated by any of Meta’s Llama models as a substitute for  
20 reading YOUR ASSERTED WORKS.

21 **RESPONSE TO REQUEST NO. 23:**

22 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
23 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
24 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
25 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff also  
26 objects to the term “documentary evidence” as being vague and overbroad because it is not



1 limited to the specific claims and defenses raised in this dispute. Plaintiff further objects to the  
2 phrase “you are personally unaware” as unintelligible. Subject to and without waiving these  
3 objections, Plaintiff admits that she is currently personally unaware of any documentary  
4 evidence demonstrating that a PERSON read text generated by any of Meta’s Llama models as a  
5 substitute for reading any of Plaintiff’s ASSERTED WORKS but denies that Plaintiff’s lack of  
6 awareness has any bearing on whether such conduct occurred or whether documentary evidence  
7 of such conduct exists. Plaintiff otherwise denies Request No. 23.

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10 **REQUEST FOR ADMISSION NO. 24:**

11 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama  
12 models that infringes YOUR ASSERTED WORKS.

13 **RESPONSE TO REQUEST NO. 24:**

14 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
15 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
16 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
17 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff  
18 objects to the phrase “personally unaware” as unintelligible. Subject to and without waiving  
19 these objections, Plaintiff denies Request No. 24.

20 **REQUEST FOR ADMISSION NO. 25:**

21 Admit that YOU have personally used one of Meta’s Llama models.

22 **RESPONSE TO REQUEST NO. 25:**

23 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and  
24 calling for discovery that is irrelevant and/or disproportional to the needs of the case because, as  
25 defined, it includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff  
26 will construe the terms “You” and “Your” as referring to Plaintiff Lysa TerKeurst. Plaintiff

1  
2 Dated: August 21, 2024

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**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

Richard Kadrey, et al.,

*Individual and Representative Plaintiffs,*

v.

Meta Platforms, Inc.,

*Defendant.*

Lead Case No. 3:23-cv-03417-VC  
Case No. 4:23-cv-04663

**PLAINTIFF JACQUELINE WOODSON'S  
RESPONSES TO DEFENDANT META  
PLATFORMS, INC.'S SECOND SET OF  
REQUESTS FOR ADMISSION**

1 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
2 allegedly use” as irrelevant and unintelligible. Plaintiff interprets this Request as asking whether  
3 Plaintiff believed the only remedy for Meta’s conduct is actual damages. Plaintiff responds, deny.

4 **REQUEST FOR ADMISSION NO. 21:**

5 Admit that, other than YOUR contention that LLM developers such as Meta should have  
6 compensated YOU to allegedly use YOUR ASSERTED WORKS to train large language models, YOU  
7 are unaware of any documentary evidence demonstrating an injury that YOU have suffered due to the  
8 infringement alleged in the COMPLAINT.

9 **RESPONSE TO REQUEST NO. 21:**

10 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
11 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
12 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
13 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase,  
14 “other than YOUR contention that LLM developers such as Meta should have compensated YOU to  
15 allegedly use” as irrelevant and unintelligible. Plaintiff responds, deny.

16 **REQUEST FOR ADMISSION NO. 22:**

17 Admit that YOU are personally unaware of any instance in which a PERSON read text  
18 generated by any of Meta’s Llama models as a substitute for reading YOUR ASSERTED WORKS.

19 **RESPONSE TO REQUEST NO. 22:**

20 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
21 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
22 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
23 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the  
24 phrase “you are personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds,  
25 admit.

26 **REQUEST FOR ADMISSION NO. 23:**

1 Admit that YOU are personally unaware of any documentary evidence demonstrating that any  
2 PERSON has read text generated by any of Meta’s Llama models as a substitute for reading YOUR  
3 ASSERTED WORKS.

4 **RESPONSE TO REQUEST NO. 23:**

5 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
6 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
7 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
8 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff also objects to the term  
9 “documentary evidence” as being vague and overbroad because it is not limited to the specific claims  
10 and defenses raised in this dispute. Plaintiff further objects to the phrase “you are personally unaware”  
11 as unintelligible. Plaintiff, in her individual capacity, responds, admit.

12 **REQUEST FOR ADMISSION NO. 24:**

13 Admit that YOU are personally unaware of any text generated by any of Meta’s Llama models  
14 that infringes YOUR ASSERTED WORKS.

15 **RESPONSE TO REQUEST NO. 24:**

16 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
17 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
18 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff will construe the  
19 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff objects to the phrase  
20 “personally unaware” as unintelligible. Plaintiff, in her individual capacity, responds, admit.

21 **REQUEST FOR ADMISSION NO. 25:**

22 Admit that YOU have personally used one of Meta’s Llama models.

23 **RESPONSE TO REQUEST NO. 25:**

24 Plaintiff objects to the defined terms “You” and “Your” as vague and overbroad and calling for  
25 discovery that is irrelevant and/or disproportional to the needs of the case because, as defined, it  
26 includes any person asked, hired, retained, or contracted to assist Plaintiff. Plaintiff objects to the  
27 phrase “YOU have personally used” as unintelligible. Plaintiff further objects to this Request as not  
28

1 terms “You” and “Your” as referring to Plaintiff Jacqueline Woodson. Plaintiff further objects to the  
 2 phrase “for a fee” as vague and ambiguous. Subject to and without waiving the foregoing objections,  
 3 Plaintiff responds that after a reasonable inquiry, the information known or that can be readily obtained  
 4 by her is insufficient to enable her to admit or deny.

5 Dated: July 22, 2024

By: /s/ Bryan Clobes  
 Bryan L. Clobes

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